



File Code: 1950

Date: February 1, 2018

Dear Friends and Neighbors of the St. Joe Ranger District:

The St. Joe Ranger District is designing a vegetation management project in the Brebner Flat area (located in the St. Joe River watershed) as shown on the attached map. The project area lies directly south of Avery, Idaho and includes the Theriault Creek, Kelly Creek, Williams Creek, and Siwash Creek drainages. You have received this letter because we are seeking public input early in our project design process and you have expressed interest in our projects.

Forest Land and Resource Management Plan

The revised IPNF Land and Resource Management (Forest) Plan was approved in January 2015, providing a framework for management of all forest resources.

The Brebner Flat Project was developed under the revised Forest Plan and is consistent with the plan.

Management Area 6 – General Forest (MA6) (8,129 acres = 93% of NFS land in the project area)

With the exception of adjacent sections of private timber company lands and the Wild and Scenic River Corridor (MA2a), the project area is within General Forest Management Area 6.

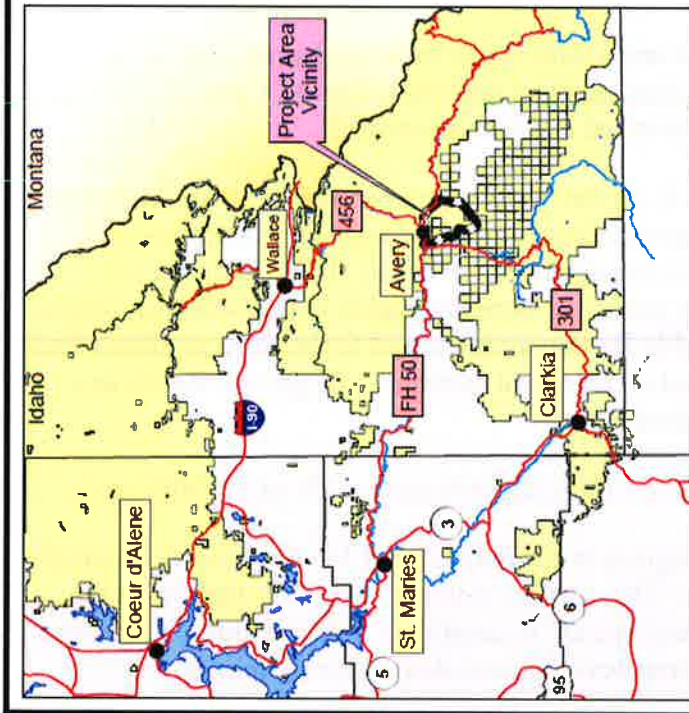
Most of this MA consists of relatively large areas with roads, trails, and structures, as well as signs of past and ongoing forest vegetation management activities. This MA provides a wide variety of recreation opportunities, both motorized and non-motorized.

Most of the Wildland Urban Interface (WUI) on the Forest occurs within MA6 and activities designed to reduce hazardous fuels are common. Vegetation and watershed restoration is accomplished predominantly through active management. Evidence of past management activities vary across the landscape, but are generally more noticeable in this MA than others. Many of the acres within this MA are suitable for the production of timber on a regulated basis, providing wood fiber in response to regional and national demand. Old growth stands and riparian areas are not managed for timber production.

Management Area 2a – Wild and Scenic Rivers (MA2a) (660 acres = 7% of the NFS land)

This MA applies to river segments that Congress or the Secretary of Interior have designated as part of the Wild and Scenic Rivers System. This section of the St. Joe River that forms the northern boundary of the project area is classified as “Recreational.” Recreational Rivers are readily accessible by road and may have some development along their shorelines.

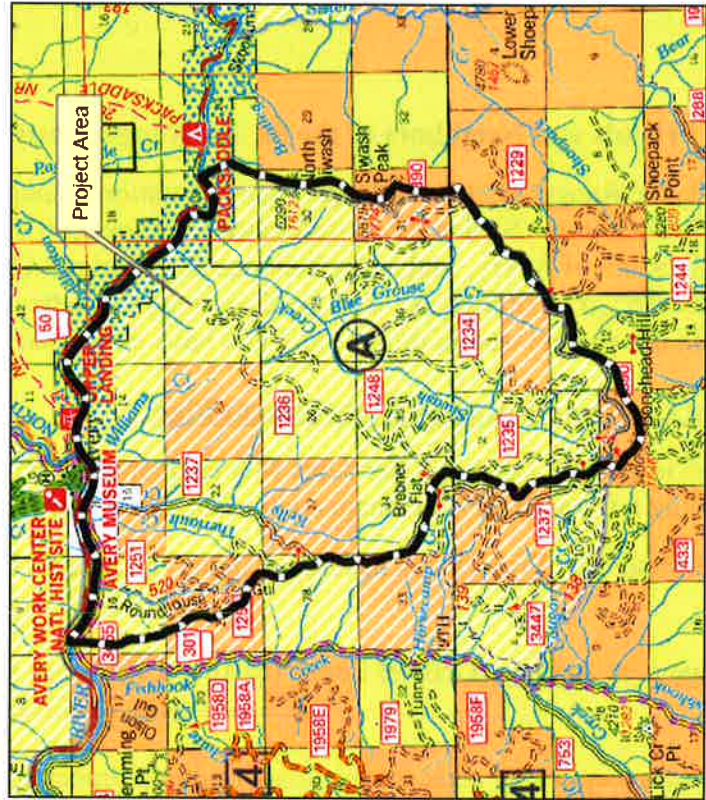




The following products are reproduced from geospatial information prepared by the U.S. Department of Agriculture, Forest Service. GIS data and product accuracy may vary. They may be developed from sources of differing accuracy, accurate only at certain scales, based on modeling or interpretation, incomplete while being created or revised, etc. Using GIS products for purposes other than those for which they are created may yield inaccurate or misleading results. The Forest Service reserves the right to correct, update, modify or replace GIS products without notification. For more information, contact the St. Joe Ranger District at (208) 245-2531.

Brebner Flat Vicinity and Project Area Map

St. Joe Ranger District
Idaho Panhandle National Forests



Purpose and Need for Action

- Improve Forest Health and Increase Vegetation Resilience
- Economics
- Reduce Hazardous Fuels

Improve Forest Vegetation Resilience

The primary focus of the Brebner Flat Project is to address forest health within the project area and to improve resilience to drought, wildfire, and insect and disease outbreaks by increasing long-lived, early seral species on the landscape. The preferred species for the project area are western white pine, western larch, and ponderosa pine.

Over time, forest vegetation in the Brebner Flat project area has departed from the historical range of variation due to a combination of fire suppression, introduction of white pine blister rust, and past management practices. White pine was a more prevalent component of the forests in the area before the introduction of white pine blister rust and subsequent white pine salvage operations. Additionally, the stand-replacing fires of 1910 and 1934, along with the resulting focus on fire suppression, further reduced the presence of white pine, western larch, and ponderosa pine on the landscape as they were replaced by more shade-tolerant species. Historically, white pine, western larch, and ponderosa pine represented a larger and important component of forested stands in the area contributing to a more resilient species composition.

In place of these early seral species, the project area is currently dominated by grand fir, Douglas-fir, and lodgepole pine. This represents an increase from species historically present on the landscape. This change in stand composition does not reflect the desired condition as described in the Forest Plan, and has made these stands more susceptible to disease and disease-related mortality. In addition, this change in composition and lack of disturbances, such as wildfire, has resulted in a lack of desired structural diversity, further contributing to the vulnerability of the forest to succumb to insect and disease outbreaks and high-severity wildfires.

Further complicating these conditions, all of the lodgepole pine stands in the project area are over-mature, decadent and infested by (or are considered at high risk for) mountain pine beetle attacks: a trend that is expected to continue into the near future. The presence of infested and susceptible lodgepole on the landscape also creates a need to improve stand resiliency by increasing species diversity and having a more diverse mix of age and size classes.

In addition, root disease was noted in all of the fir-dominated stands visited by the silviculturists during project area assessments. Root diseases are associated mostly with stands dominated by true firs, western hemlock, and Douglas-fir. Root diseases were also found in lodgepole pine and Engelmann spruce in the project area.

A desired condition for the IPNF is to have more forest "... dominated by western white pine, ponderosa pine, and western larch ... and less of the forest is dominated by grand fir ... Douglas-fir, lodgepole pine ..." (FW-DC-VEG-01) with an objective of having more resilient forest conditions (FW-OBJ-VEG-01, FW-DC-VEG-06).



There is also a need to manage the landscape arrangement of forest structure and age class on National Forest System (NFS) lands within the Brebner Flat project area. The average patch size for seedling/sapling size trees is currently below historical size and does not meet IPNF desired conditions. This is primarily due to the lack of stand-replacing fire since 1934, along with the smaller average size and pattern of timber harvests on the NFS lands in the project area. Increasing the average patch size for seedling/sapling sized trees is important for regenerating early seral species (e.g., ponderosa pine, western larch, and western white pine) that are more resistant to disturbances. A desired condition for the IPNF is to have more of the forest dominated by stands occurring in the seedling/sapling size class (FW-DC-VEG-02, FW-DC-VEG-05).

The existing condition for these dense, mature lodgepole pine and grand fir/Douglas-fir stands is outside the natural range of variability in terms of species composition, insect and disease activity, and diversity in stand structure. While root diseases and mountain pine beetle are introducing some variety, these agents act differently than fire in that they are continually causing tree mortality rather than in a distinct event, and are less likely to promote the more resilient, long-lived, early seral species. Over time mountain pine beetles and root diseases reduce canopy cover and it is unlikely that most of the mid-seral stands will reach an old growth condition or maintain it for a long period of time.

For these reasons, we want to improve forest landscape resiliency by promoting forest composition and structure that best resist insects, disease, and drought. Specifically, we want to:

- Increase the number of acres where western white pine, western larch and ponderosa pine are major components.
- Increase the patch size of forest openings to allow growing conditions beneficial to western white pine, western larch and ponderosa pine.
- Create more diversity in age classes across the project area.

Economics

The project is needed to provide sustainable use of natural resources and produce benefits for local communities. It would address local and regional socio-economic interests by providing sustainable forest products. Outputs are needed to create or maintain jobs and income in the counties surrounding the IPNF, promote stability in the local economy, and help maintain quality of life in local communities. The project would address the following social and economic goals and desired conditions of the 2015 IPNF Forest Plan:

GOAL-SES-01: Contribute to the social and economic well-being of local communities by promoting sustainable use of renewable natural resources. Provide timber for commercial harvest, forage for livestock grazing, opportunities for gathering firewood and other special forest products, permitted recreation residences, and settings for recreation consistent with goals for watershed health, sustainable ecosystems, biodiversity, and scenic/recreation opportunities.

FW-DC-SES-01: Outputs and values generated by the Forest contribute to sustaining social and economic systems.



FW-DC-SES-02: The outputs and values provided by the Forest contribute to the local economy through the generation of jobs and income while creating products for use, both nationally and locally. Jobs and income generated by the activities and outputs from national forest management remain stable, contributing to the functional economy surrounding the IPNF.

FW-DC-SES-03: The outputs and values provided by the Forest contribute to community stability or growth and the quality of lifestyles in the Plan area.

Hazardous Fuels

Vegetation management activities are needed to move the Forest toward conditions that reduce risk to local residents, communities, and values by decreasing the chances of uncharacteristic wildfire through reduction of fuel loads in the project area.

FW-DC-SES-04: To the extent possible, the Forest contributes to the protection of communities and individuals from wildfire within the limits of firefighter safety and budgets.

A need exists to reduce hazardous fuels and the threat of wildland fire and to allow for more safe and effective fire management in the Brebner Flat project area. This is the desired condition for fuels in the Wildland Urban Interface (WUI) according to the 2015 Forest Plan for the IPNF (MA6-GDL-FIRE-01). The town of Avery and Forest Highway 50, the main ingress/egress road along the St. Joe River for residents and first responders in the event of an emergency, lie along the northern boundary of the project area. Shoshone County has identified this as an area of concern in their Community Wildfire Protection Plan (ref. CWPP doc.). Approximately four sections of privately-owned timberland are intermixed with the public timberland in the Brebner Flat project area. These sections are in various stages of timber production and are valued by their owners for commercial value now and into the future. Areas along National Forest System land boundaries adjacent to private land could benefit from fuels reduction in the form of timber harvest and removal.

Proposed Action

The St. Joe Ranger District has conducted a coarse analysis of the existing forest conditions in the project area, and we have identified about 1,948 acres of the approximately 11,779-acre project area that would benefit from treatment (approximately 1,948 acres of timber harvest). Timber harvest would occur in stands where species of trees most susceptible to root disease and insect infestations are dominant. No timber harvest would occur in the project area's old growth stands or in stands where timber harvest has occurred relatively recently. Riparian areas, wildlife buffers, and the Wild and Scenic River Corridor were not proposed for timber harvest. Table 1 shows the proposed treatment acres by treatment type. About 617 acres of potential recruitment old growth have been identified within the project area and will be verified as the project progresses.



Table 1. Proposed vegetation management treatments in the Brebner Flat project area.

Vegetation Management Treatment	Proposed Action (acres)
Commercial timber harvest/Silvicultural system	
Seed tree with leave trees	829
Clearcut with leave trees	763
Irregular shelterwood- seed tree with reserves	356
Total	1,948

Timber Harvest

We are proposing to harvest timber on 1,948 acres. There is a need to accelerate or maintain the development of western larch, ponderosa pine, and blister rust-resistant western white pine. The forests in the Brebner Flat Project Area now have more Douglas-fir and grand fir and less western larch, western white pine, and ponderosa pine than they previously had (Toward an Ecosystem Approach: An Assessment for the St. Joe Area, 1997, pp. 15, 45-47). With this change, forest resiliency following disturbance is decreasing; and the risk of stand loss to insects, disease, fire, and changing climate is increasing.

As noted in the forest health report from September 13, 2011, additional mortality of more than half of the lodgepole pine trees are predicted over the next ten years. Even-aged management through clearcutting, shelterwood, or seed tree harvest systems with the goal of creating a mosaic of different age and size classes across a landscape creates a minimum area susceptible to mountain pine beetle. Specifically, the field report produced after the visit by the Forest Health Protection staff predicted that thinning in some stands would likely result in an unacceptable amount of windthrow due to the exposed ridgetop location of some lodgepole stands.

As described in the initial silviculture report and the forest health protection trip report, root disease was found in every stand visited in the project area. Since most of the stands are dominated by Douglas-fir and grand fir which are inherently more susceptible to root diseases than western white pine or western larch, intermediate harvests (such as thinning) are an untenable option. If intermediate harvest methods were applied in the project area to limit opening sizes, stand conditions would continue to deteriorate. In order to promote conditions that move toward the desired condition of resilient and healthy stands, we are proposing regeneration harvest in many of the stands which would result in openings larger than 40 acres in most of the proposed harvest units. These larger openings are needed in order to apply the silvicultural prescription recommended by the project silviculturist and Forest Health Protection personnel. Leaving patches of Douglas-fir, grand fir, and lodgepole pine would lead to further deterioration of the remaining stands.

We are proposing a combination of treatments including clearcut with reserves, seed tree harvest with reserves, and shelterwood harvest, where the more resilient and/or longer-lived tree species



such as western larch, western white pine, or ponderosa pine are currently a very minor component in the stand. Removing the less resilient trees (grand fir, Douglas-fir, and lodgepole pine) and those affected by disease or insect infestations would result in the removal of most of the overstory trees in these stands. These harvests would be followed by planting these sites with more resilient tree seedlings to add to the natural regeneration. The reserve trees left on site would be comprised of western white pine, western larch, and ponderosa pine where they currently exist. Other existing tree species would also be left to meet resource objectives. These reserve trees would provide seed, future snags, some overstory structure for ground shading, wildlife habitat, and coarse woody debris for soil productivity. Figure 1 shows one example of what the forested stand may look like before treatment and figure 2 shows an example of a stand after regeneration treatment.



Figure 1



Figure 2

Road and Travel Management

A travel analysis process was conducted to determine a minimum road system for the project area. To facilitate the proposed timber harvest, approximately 2.5 miles of new system road would be constructed. After planting is complete in the harvest units, the roads would be hydrologically stabilized for future administrative use. New permanent roads would be



accessible for administrative motorized use only and would not be open to public motorized use through the use of gates or barriers.

In addition, approximately 4 miles of temporary roads would be constructed to access treatment units. Temporary roads and landings would generally be located on dry ridgetops and designed to standards appropriate for the intended uses, considering safety, cost of transportation, and potential to impact resources (16 U.S. Code 1608(b) and (c)) and to make progress toward achieving forest-wide desired conditions (FW-DC-AR-07).

At the completion of the project, temporary roads would be decompacted, recontoured to the approximate shape of the surrounding terrain, and seeded or covered with logging slash or other debris to prevent erosion and accelerate hydrologic and vegetative recovery.

Finally, we propose to store or decommission some existing roads or road segments in the project area (see attached map) for a variety of reasons including reducing road maintenance costs and increasing wildlife security or because the road is not needed for management of the national forests. Approximately 2.9 miles of administrative roads would be put into long term storage and 1.3 miles of non-system road would be closed permanently.

Potential Project-specific Forest Plan Amendment

As required by NFMA and the planning rule, all projects and activities authorized by the Forest Service must be consistent with the applicable plan components (16 U.S.C. 1604(i)) as described at 36 CFR 219.15 of the 2012 Planning Rule.

The Forest Plan states; “where a proposed project or activity would not be consistent with Plan direction, the responsible official has the following options: (1) modify the project to make it consistent, (2) reject the proposed project, or (3) amend the forest plan so that it will be consistent with the project. The amendment may be limited to apply only to the project or activity and may be adopted at the same time as the approval of the project or activity via project specific environmental analysis and public involvement (36 CFR Sec. 219.10(f)).”

As part of the proposed action, we may consider a site-specific Forest Plan amendment in order to maximize the vegetation restoration objectives of the project. Forest-wide guideline FW-GDL-WL-13 states, “Management activities in elk management units should maintain existing levels of elk security (see glossary).” The proposed harvest may reduce vegetation to the extent that elk habitat security is decreased, which would not be consistent with the Forest Plan guideline to maintain existing levels of elk security. The long-term benefit of this proposed amendment for elk is the opportunity to be able to create greater amounts of early seral forage habitat over a broader area; and in locations where elk are less vulnerable.

As described above, the project proposes to create openings larger than 40 acres, in order to restock the treated areas with seedlings comprised of more resilient species such as western white pine, western larch, and ponderosa pine. These openings would result in the loss of about 290 acres of elk security in the project area for a period of time (approximately 10-15 years) until the regenerated trees grow enough to provide cover for elk.

The following substantive requirements of the planning regulations at 36 CFR 219.8-219.11 are likely to be directly related to the amendment (219.13(b)(5)): §219.10(a)(1) Fish and wildlife



species, habitat and habitat connectivity, vegetation; §219.10 (a)(5) Habitat conditions; §219.10(b)(i) Sustainable recreation.

Over 40-acre Openings (NFMA Requirements)

The proposed harvest activities utilize clearcut, seed tree, and shelterwood harvests with or without reserves which are intended to create openings in order to regenerate even-aged or two-aged stands in one harvest operation. As a result, about 17 openings greater than 40 acres in size would be created with the proposed harvest units, either due to proposed unit size or as a result of adjacent units or existing adjacent openings.

Forest Service policy (FSM 2471.1) directs land managers to normally limit the size of harvest openings created by even-aged harvesting methods to 40 acres or less. However, exceptions to the 40-acre opening limitation are allowable with Regional Forester approval. A request to exceed the 40-acre size limitation on specific regeneration harvest units will be made in accordance with FSM 2470.1, as described by Section 6 of the National Forest Management Act.

Healthy Forest Restoration Act/2014 Farm Bill

Every five years, Congress passes a bundle of legislation (commonly called the "Farm Bill") that sets national agriculture, nutrition, conservation, and forestry policy. Among the provisions that pertain to the Forest Service, Section 8204 of the 2014 Farm Bill amends Title VI of the 2003 Healthy Forest Restoration Act (HFRA; 16 U.S.C. 6591) by adding section 602 (Designation of Treatment Areas) and section 603 (Administrative Review) to address qualifying insect and disease infestations on National Forest System lands.

On May 20, 2014, Department of Agriculture Secretary Vilsack announced the designation of approximately 45.6 million acres of National Forest System lands across 94 national forests in 35 states to address insect and disease threats that weaken forests and increase the risk of forest fire. On the IPNF, 26 treatment areas (397,496 acres) were designated, including acreage affected by insects and disease in the Brebner Flat area. The Governor of Idaho has asked that priority be given to project development within these designated insect and disease areas.

The Brebner Flat Project may be carried out in accordance with Title VI, section 602 (d). This HFRA section provides for expedited NEPA reviews, pre-decisional objection review, and guidance on judicial review. Such designation does not change or exempt the Forest Service from complying with any other existing law, regulation and policy such as the National Environmental Policy Act, Endangered Species Act, Clean Water Act, National Historic Preservation Act, or any other applicable law, regulation, and/or policy that affects the designated area.

Comments and Objections

The National Environmental Policy Act (NEPA) requires an in-depth analysis of our proposed actions. A team of resource specialists comprised of a forester, silviculturist, fuels specialist, wildlife biologist, fisheries biologist, archeologist, botanist, hydrologist, landscape architect, soils scientist, and other specialists will document the existing condition of the project area and analyze the potential effects of implementing the project. This information will be compiled in a NEPA document (Environmental Analysis or EA).



The Brebner Flat Project will be completed using the authority of the Healthy Forests Restoration Act of 2003 (HFRA), Public Law 108-48, as amended by the 2014 Farm Bill, Section 8204. Projects authorized under the HFRA are subject to the Pre-decisional Administrative Review Process (referred to as the "objection process") pursuant to 36 CFR 218, Subparts A and C.

Objections will only be accepted from those who have submitted written comments specific to the proposed project during scoping or other public involvement opportunity where written comments are requested by the responsible official (36 CFR 218.5). We will have a public meeting about the project this winter. We must also specify a 30-day comment period on the proposed action. We have chosen to conduct that comment period when we release the draft environmental assessment. You may submit comments now, at the public meeting, or during the 30-day comment period.

We would like to hear from you now during the scoping period if you have any information we should be aware of related to this project area or if you have any concerns or potential outcomes you would like us to consider as we develop the project. Your comments are most valuable to us if they are specific to the Brebner Flat project proposal and the local conditions found within the proposed project area.

The Forest Service will use public input to identify issues that need to be addressed. Timely input will ensure your ideas are incorporated into the project development. Please submit comments by March 5, 2018.

After receiving and considering comments on the draft environmental assessment, we will circulate a draft of the decision notice to provide those who commented an opportunity to object to the decision before it is signed. This is referred to as the objection period. The intent of the objection process is to allow the responsible official to collaborate with objectors, resulting in a better, more informed decision.

The St. Joe Ranger District is requesting your comments about this proposed action. We have included a comment form with this letter. You may use it if you prefer, but it is not required.

If you would like to remain on the mailing list for this project but choose not to make specific comments, or would like to be taken off the mailing list for this project, please let us know. The attached comment form has an option for you to let us know your preference.

You may reply using any of these three methods:

- 1) Mail your specific comments to the St. Joe Ranger District Planning Staff:

St. Joe Ranger District
222 South 7th St, Suite 1
St. Maries, ID 83861




- 2) Email your comments to: comments-northern-idpanhandle-stjoe@fs.fed.us. Include in the subject line of your email the project title: **Brebner Flat**
- 3) Call Ben Timchak, St. Joe Ranger District Planning Staff at 208-245-6071

Information we receive in response to this solicitation, including names, addresses, email addresses, and phone numbers of those who provide input, will be considered part of the public record and will be available for public inspection. Comments may also be submitted anonymously, but those people who submit comments anonymously will not have standing to file an objection.

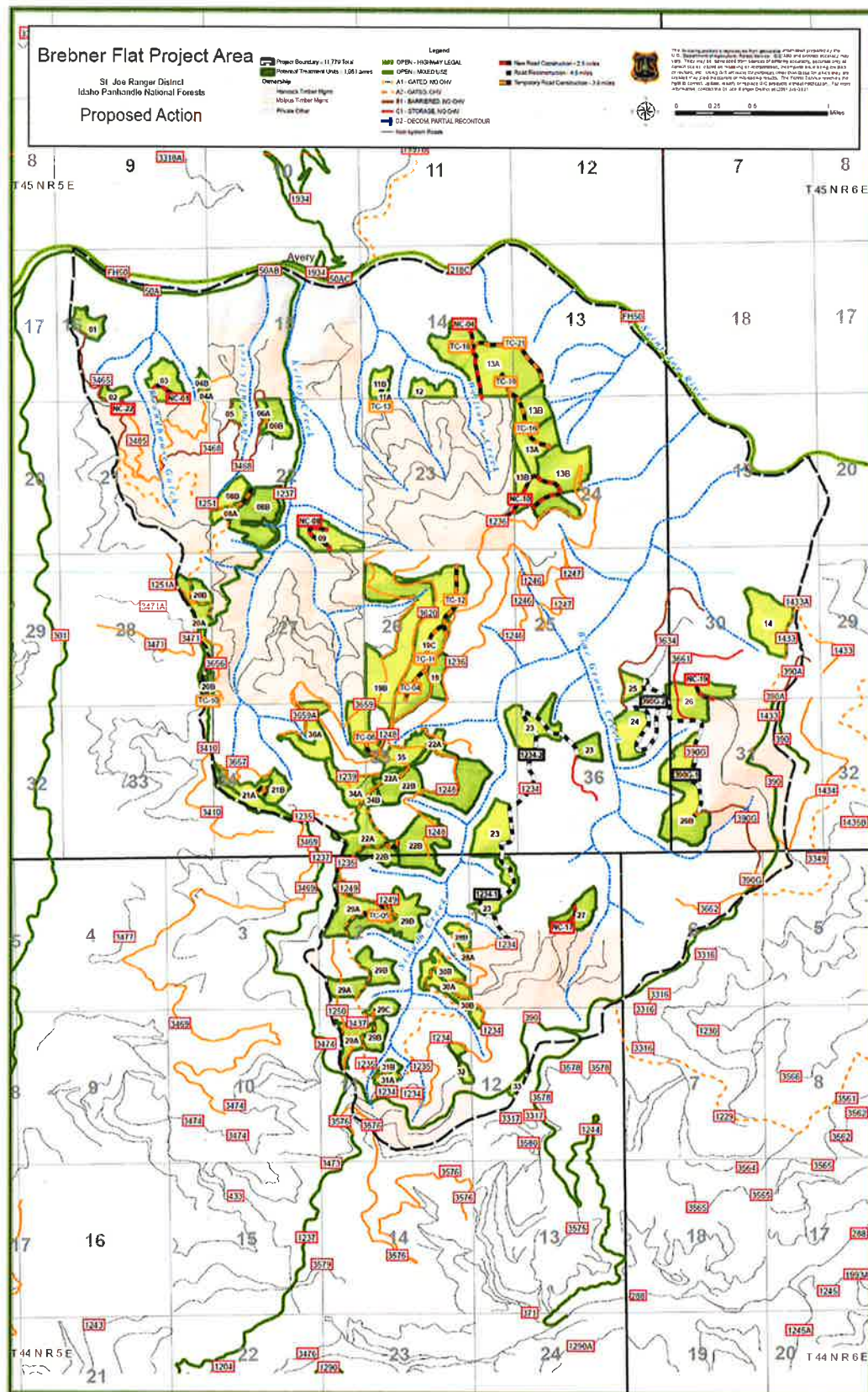
I appreciate your interest in the management of your public lands.

Sincerely,



Matthew Davis
St. Joe Ranger District





☐ **Yes, please keep my name on the list to receive future mailings regarding the Brebner Flat Project**

☐ **No, please remove my name from the mailing list for the Brebner Flat Project.**

Name: _____

Postal Address: _____

Email Address: _____

☐ *I prefer to receive information electronically at the above email address.*

My comments are: *(please add additional pages as needed)*

Please return this form to:

St. Joe Ranger District
222 South 7th Street Ste. 1
St. Maries, Idaho 83861

or

Email: btimchak@fs.fed.us



